

REMARKS/ARGUMENTS

In an Office Action dated May 22, 2006, claim 2 was objected to; claims 6, 8, 16, 18, 37 and 39 were rejected under § 112, ¶ 2; claims 1-4, 6-23, 25, 27-30, 32-35 and 37-39 were rejected under § 102 based on Iwata and claims 5, 24, 36, 31 and 36 were rejected under § 103 based on Iwata in view of Heil. Applicants respectfully traverse the rejections under § 112 and the rejections of former claims 4, 7, 15, 17, 30, 35 and 38 and request consideration of the following arguments.

Claim Amendments

Claims 2 and 33 have been amended to address the claim objection. Claims 6, 16 and 37 have been amended to correct an informality. Claim 1 has been amended to incorporate former claim 4. Claim 7 has been amended to incorporate former claim 1. Claim 12 has been amended to incorporate former claims 9 and 15. Claim 17 has been amended to incorporate former claims 9 and 12. Claim 27 has been amended to incorporate former claim 30. Claim 32 has been amended to incorporate former claim 35. Claim 38 has been amended to incorporate former claim 32. Claims 4, 9-11, 15, 19-26, 30 and 35 have been cancelled.

§ 112 Rejections

Claims 6, 8, 16, 18, 37 and 39 were rejected under § 112, ¶ 2. Applicants respectfully traverse the rejections.

Claims 6, 16 and 37

Taking claim 6 as exemplary, claim 1 requires first and second switching fabrics. It is well understood that any traffic in a switching fabric is “in-band” traffic and any traffic not in the switching fabric is “out-of-band” traffic with respect to the switching fabric. For example, in most Fibre Channel fabrics, management can be performed in-band, *i.e.* in the Fibre Channel data paths using specified command sequences, or out-of-band in a parallel Ethernet fabric, with each switch in the Fibre Channel fabric having an

Ethernet port, with other specified command sequences. Thus, with reference to this example, the first and second interfaces would use the Fibre Channel data paths for in-band operation or to the parallel Ethernet fabric for out-of-band operation.

Applicants thus respectfully submit that claims 6, 16 and 37 are sufficiently distinct.

Claims 8, 18 and 39

Taking claim 8 as exemplary and referencing the discussion on claims 6, 16 and 37, in the example above the first and second interfaces would use the Fibre Channel data paths for in-band operation and the interconnection link could be any other link not part of the Fibre Channel data paths of the first and second Fibre Channel fabrics, such as an Ethernet link over a separate Ethernet fabric.

Applicants thus respectfully submit that claims 8, 18 and 39 are sufficiently distinct.

§ 102 Rejections

Claim 1

As noted above, current claim 1 is prior claim 4, so these remarks address the rejection of claim 4. Claim 1 requires that the inter-fabric adjunct processor include a processing unit and a system management control module. The Office Action has equated the ASBR-A1 and ASBR-B1 of Iwata to correspond to the inter-fabric adjunct processor. The rejection of claim 4 equates the End-to-End Path selection unit 132 of Iwata to be the system management control unit, as best understood by Applicants. But the selection unit 132 is part of the transmission router 140, which is not part of an ASBR and is equated later in the Office Action to a switching unit. This correspondence is improper as the claim requires the system management control module to be a portion of the inter-fabric adjunct processor, which the Office Action has defined as the ASBRs but the Office Action then corresponds it to an element in Iwata other than an ASBR. Applicants thus submit that the correspondence is improper and the claim is allowable.

Claim 7

Claim 7 requires embedded adjunct processors located in switching elements in the switching fabrics. The Office Action has defined the OSPF-TE units in the ASBR units (defined as the inter-fabric adjunct processor) to be the embedded adjunct processors. However, in the discussion of claim 9 the Office Action defines the switching element as the transmission router 140. Therefore the Office Action correspondence has not met the claim requirement that the embedded adjunct processors are located in switching elements. As a result the rejection is improper and claim 7 is allowable.

Claims 12, 17, 27, 35 and 38

Independent claims 12, 27 and 35 are similar to claim 1 and like arguments apply. Independent claims 17 and 38 are similar to claim 7 and again like arguments apply. Applicants therefore submit that the claims are allowable.

CONCLUSION

Based on the above remarks Applicants respectfully submit that all of the present claims are allowable. Reconsideration is respectfully requested.

Respectfully submitted,

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